

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, et al.,  
  
Debtors.<sup>1</sup>

Chapter 11

Case No. 23-90147 (DRJ)

(Jointly Administered)

**Related Docket Nos. 536, 701**

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**DEBTORS' AMENDED WITNESS AND EXHIBIT LIST**

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Mountain Express Oil Company and certain of its affiliates (collectively, the “Debtors”) hereby submits the following *Amended Witness and Exhibit List* (the “Witness and Exhibit List”) with respect to the hearing scheduled on August 7, 2023, at 2:00 p.m. (CT), in the above-captioned bankruptcy cases (the “Cases”), pending before the Honorable David R. Jones, United States Bankruptcy Judge.

**WITNESS LIST**

The Debtors may call the following witnesses:

1. Michael Healy, Chief Restructuring Officer.
2. Geoffrey Richards, Raymond James & Associates, Inc.
3. Johnathan Tibus, Alvarez & Marsal.
4. Paula M. Davis, First Horizon Bank.
5. Richard D. Marshall, Bank of Hope.
6. Any witness listed, offered, or called by any other party.

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at [www.kccllc.net/mountainexpressoil](http://www.kccllc.net/mountainexpressoil). The location of Debtor Mountain Express Oil Company's principal place of business and the Debtors' service address in these Chapter 11 Cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

7. Any witness required for rebuttal or impeachment.

**EXHIBIT LIST**

<b>Exhibit No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>	<b>Disposition After Hearing</b>
1.	Notice of (I) Default Under Final DIP Order and Credit Agreement and (II) Carve Out Trigger Date, dated August 3, 2023				
2.	Letter of Intent from GPM Investments, LLC, <i>et al.</i> (unsigned)				
3.	Auction Transcript [To be Filed]				
4.	Letter Notice of Occurrence of Maturity dated August 3, 2023				
5.	Notice of Occurrence of Maturity Dated [Docket No. 1168]				
6.	Bank of Hope Email dated August 1, 2023 from Richard D. Marshall				
7.	Bank of Hope Email Response dated August 1, 2023 from Geoffrey Richards				
8.	<i>Certificate of Service</i> of Benjamin L. Wallen [Docket No. 1189]				
9.	Cash Collateral Budget				
10.	Any exhibits listed, designated, or offered by any other party.				
11.	Any exhibits necessary for rebuttal.				
12.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases and related adversary proceedings.				

The Debtors reserve the right to modify, amend or supplement this Witness and Exhibit List at any time. The Debtors reserve the right to ask the Court to take judicial notice of pleadings, orders, transcripts and/or documents filed in or in connection with these Cases, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the August 7, 2023 hearing. Designation of any exhibit above does not waive any objections the Debtors may have to any exhibit listed on any other party's exhibit list.

Dated: August 4, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Michael D. Warner

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*Counsel to the Debtors and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2023, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases.

/s/ Michael D. Warner

Michael D. Warner